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November 5, 2021

Via ECF

Southern District of New York
ATTN: HON. ALISON J. NATHAN, U.S.D.J.
40 Foley Square, Room 2102
New York, New York 10007

RE: HYUNHUY NAM v. PERMANENT MISSION OF THE REPUBLIC OF KOREA TO THE UNITED NATIONS, et al.
CASE NO.: 1:21-cv-6165-AJN
REQUEST FOR ENLARGEMENT OF PAGE LIMIT FOR PLAINTIFFS' REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF MOTION TO DISMISS

Dear Judge Nathan:

As Your Honor is aware, this office represents the defendants, Permanent Mission of the Republic of Korea to the United Nations (hereinafter, the "Mission") and three of its diplomats, Hyon Cho, Jinho Jo, and Daeyong Chung (collectively, "Diplomats") (Diplomats and Mission, collectively, "Defendants"), in the above-referenced matter.

Defendants are currently preparing their reply in further support of their motion to dismiss. Pursuant to the scheduling order (DE35), Defendants' reply papers are due on November 9, 2021. Defendants respectfully request an enlargement of the page limit to fifteen (15) pages for the reasons below.

Mindful of Your Honor's Individual Rules, this office notes that the page limit for the reply memorandum of law for motions is 10 pages. § 3(B). This firm has completed a draft of the memorandum of law, resulting in 13 pages with additional formatting to be done. Most of the memorandum concerns arguments countering the deficient nature of Plaintiff's declarations and arguments. Although Plaintiff's opposition was succinct, this firm is compelled to address all the arguments which may be gleaned from the opposition papers, to cover all bases.

For the foregoing reasons, Defendants request that the page limit for Plaintiffs' motion for summary judgment be enlarged to fifteen (15) pages. This firm will endeavor to minimize the page
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count as much as possible.

We thank the Court for its time and attention in this matter.

Respectfully submitted,

/s/ Sean S. Kwak

Sean S. Kwak

cc: Plaintiff's counsel – via ECF